

November 7, 2018

**Electronically filed via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

**Re: Ex Parte Letter  
IB Docket No. 17-16**

Dear Ms. Dortch:

The Association of American Railroads ("AAR"),<sup>1</sup> through its counsel, submits this letter in support of the adoption of the draft order of the Federal Communications Commission ("Commission") permitting non-Federal U.S. receive-only earth stations to operate with the E1 and E5 signals of the Galileo Global Navigation Satellite System ("GNSS").<sup>2</sup> As stated in the Draft Galileo Order, "combining the use of Galileo and GPS signals would improve the reliability, accuracy, and resiliency of positioning for PNT [positioning, navigation, and timing] applications and services."<sup>3</sup>

The adoption of this order will have an immediate positive impact on the rail industry by improving positioning data in areas where GPS satellite signals may be difficult to receive, such as natural or urban canyons. As the Commission is aware, railroads are developing high-precision PNT applications and services specifically to enhance the safety and efficiency of rail operations.

One such example is positive train control ("PTC"). Once implemented, PTC systems will reduce the risk of rail accidents caused by human error, including train-to-train collisions, derailments caused by excessive speed, and unauthorized train movements in work zones. PTC systems will rely on real-time information sharing between trains, rail wayside devices, and control centers monitoring train position and speed and the state of signal and switch devices. Many of these capabilities will

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<sup>1</sup>AAR is a voluntary non-profit membership organization whose freight railroad members operate 83 percent of the line-haul mileage, employ 95 percent of the workers, and account for 97 percent of the freight revenues of all railroads in the United States. AAR members also include Amtrak, the nation's principal intercity passenger railroad, and Metra, the primary commuter railroad serving the Chicago metropolitan area. More information on AAR is available at its website: <https://www.aar.org>.

<sup>2</sup>See FCC Fact Sheet, *Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service*, FCC-CIRC1811-01 (October 25, 2018) ("Draft Galileo Order").

<sup>3</sup>*Id.* at ¶14.

depend on high-precision positioning data, which can be greatly enhanced by access to foreign GNSS signals, such as the Galileo E1 and E5 signals.

Accordingly, AAR applauds the efforts of the Commission and other government agencies that contributed to this proceeding and urges the Commission to expeditiously adopt the Draft Galileo Order.

Respectfully submitted,

/s/ Michele C. Farquhar

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